

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

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Case No. 5:21-cv-844-XR
[Lead Case]

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

JOHN SCOTT, *et al.*,

Defendants.

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Case No. 1:21-cv-786
[Consolidated Case]

EXHIBIT D

LETTER OF 03.29.2022

Jack DiSorbo

From: Liliana Zaragoza <lzaragoza@naacpldf.org>
Sent: Tuesday, March 29, 2022 2:17 PM
To: Kathleen Hunker; Patrick Sweeten; Will Thompson; Eric Hudson; Elizabeth Saunders; Joshua Clarke; Aaron Barnes; Jeff White; Jack DiSorbo
Cc: mimi@texascivilrightsproject.org; Zachary Dolling; Patrick Stegemoeller; Samantha Osaki; skumar@aclutx.org; Sophia LIn Lakin; Susana Lorenzo-Giguere; tbuser-clancy@aclutx.org; umittal@jenner.com; asavitzky@aclu.org; aharris@aclutx.org; Adriel I. Cepeda Derieux; asegura@aclutx.org; hani@texascivilrightsproject.org; Jerry Vattamala; jamunson@jenner.com; ldavis@drtx.org; lostrom@drtx.org; Georgina Yeomans; Keely Dulaney; Kathryn Sadasivan; Kenneth E. Broughton; Amir Badat; Sarah M. Cummings; Shira Wakschlag; sean@lyonsandlyons.com; bclements@freespeechforpeople.org; laura.rosenbaum@stoel.com; wendy.olson@stoel.com; chostetler@freespeechforpeople.org; elijah.watkins@stoel.com; jbonifaz@freespeechforpeople.org; marc.rasich@stoel.com; rfein@freespeechforpeople.org; Clem@lyonsandlyons.com; nperales@maldef.org; christopher.bell@friedfrank.com; jason.kanterman@friedfrank.com; Jlongoria@MALDEF.org; kevin.zhen@friedfrank.com; michael.keats@friedfrank.com; rebecca.martin@friedfrank.com; liz.ryan@weil.com; paul.genender@weil.com; Sean Morales-Doyle; alexander.cohen@weil.com; andrew.garber@nyu.edu; jasleen.singh@nyu.edu; matt.berde@weil.com; patrick.berry@nyu.edu; Christian.Menefee@cao.hctx.net; Fombonne, Jonathan (CAO); sameer.birring@cao.hctx.net; domingo@dgley.com; gwhite@elias.law; johnhardin@perkinscoie.com; jhawley@elias.law; jposimato@elias.law; kyukevich@elias.law; melias@elias.law; mmixon@elias.law; unkwonta@elias.law; aleo@cooley.com; mejab@cooley.com; christine@statesuniteddemocracy.org; ghabell@cooley.com; khartnett@cooley.com; kspector@cooley.com; oarmon@cooley.com; ranjana@statesuniteddemocracy.org; zack@statesuniteddemocracy.org; Green, Robert D.; Barbara.Nicholas@dallascounty.org; ben.stool@dallascounty.org; earl.nesbitt@dallascounty.org; tony.nelson@traviscountytexas.gov; leslie.dippel@traviscountytexas.gov; patrick.pope@traviscountytexas.gov; sherine.thomas@traviscountytexas.gov; Josephine Ramirez; leigh.tognetti@da.co.hidalgo.tx.us; Stewart, Michael (CRT); Freeman, Daniel (CRT); Yun, Jennifer (CRT); Paikowsky, Dana (CRT); Dellheim, Richard (CRT); lisa.cubriel@bexar.org; R. Gary Spencer; Jennifer A. Holmes
Subject: LUPE v. Abbott, 5:21-cv-844 (WD Tex) - Legislator Subpoenas
Attachments: Cain - HAUL v Abbott - Subpoena to Testify at a Deposition.pdf; Hughes - HAUL v Abbott - Subpoena to Testify at a Deposition.pdf; Murr - HAUL v Abbott - Subpoena to Testify at a Deposition.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Counsel,

On behalf of the Consolidated Plaintiffs, please find attached subpoenas seeking the deposition testimony of Texas legislators Briscoe Cain, Bryan Hughes, and Andrew Murr. Would you be willing to accept service on their behalf?

Regarding dates and times, we propose that the depositions take place between April 11 – 15 and each begin at 10 am Central time. If none of those options work for you, please provide alternatives. Once we have come to an agreement, we can update the subpoenas accordingly.

Best,
Liliana

Liliana Zaragoza (*she/her/hers*)

Assistant Counsel

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